

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

MASON STICKNEY,

Defendant.

CRIMINAL NO. 17-10368-DJC
(MPK)

VIOLATIONS:

**18 U.S.C. 1958(a) – Use of Interstate
Commerce Facilities in the Commission
of Murder-For-Hire**

**18 U.S.C. § 981(a)(1)(C) &
28 U.S.C. § 2461 - Forfeiture**

INDICTMENT

**COUNT ONE: 18 U.S.C. § 1958(a) – Use of Interstate Commerce Facilities in the
Commission of Murder-For-Hire**

The Grand Jury charges that:

From on or about a date in October 2017 to on or about November 9, 2017, at Middleton,
and elsewhere in the District of Massachusetts,

MASON STICKNEY,

defendant herein, used and caused another to use a facility of interstate commerce with intent
that the murder of Victim 1, a person known to the Grand Jury, be committed in violation of the
laws of the Commonwealth of Massachusetts as consideration for the receipt of, and as
consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

**COUNT TWO: 18 U.S.C. § 1958(a) – Use of Interstate Commerce Facilities in the
Commission of Murder-For-Hire**

The Grand Jury further charges that:

From on or about a date in October 2017 to on or about November 9, 2017, at Middleton,
and elsewhere in the District of Massachusetts,

MASON STICKNEY,

defendant herein, used and cause another to use a facility of interstate commerce with the intent
that the murder of Victim 2, a person known to the Grand Jury, be committed in violation of the
laws of the Commonwealth of Massachusetts as consideration for the receipt of, and as
consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

COUNT THREE: 18 U.S.C. § 1958(a) – Use of Interstate Commerce Facilities in the Commission of Murder-For-Hire

The Grand Jury further charges that:

From on or about a date in October 2017 to on or about November 9, 2017, at Middleton, and elsewhere in the District of Massachusetts,

MASON STICKNEY,

defendant herein, used and caused another to use a facility of interstate commerce with intent that the murder of Victim 3, a person known to the Grand Jury, be committed in violation of the laws of the State of New Hampshire as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value.

All in violation of Title 18, United States Code, Section 1958(a).

FORFEITURE ALLEGATION
(18 U.S.C. § 981(a)(1)(C) & 28 U.S.C. § 2461(c))

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 1958(a), set forth in Counts One through Three of this Indictment,

MASON STICKNEY,

defendant herein, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), any property, real or personal, that constitutes, or is derived from, proceeds traceable to the commission of the offenses.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C), and 28 U.S.C. § 2461(c), as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to 28 U.S.C. § 2461(c), incorporating 21 U.S.C. § 853(p), to seek forfeiture of all other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL



FOREPERSON OF THE GRAND JURY



ROBERT E. RICHARDSON
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; 11/30, 2017

Returned into the District Court by Grand Jurors and filed.



DEPUTY CLERK

11:54 am

11/30/17